

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re</p> <p>Crédito Real, S.A.B. de C.V., SOFOM, E.N.R.,¹</p> <p style="text-align: center;">Debtor in a Foreign Proceeding.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 15</p> <p>Case No. 22-10630 (JTD)</p> <p>Proposed Objection Deadline: January 24, 2023 at 12:00 p.m. (ET)</p> <p>Proposed Hearing Date: January 25, 2023 at 10:00 a.m. (ET)</p>
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NOTICE OF MOTIONS AND HEARING

PLEASE TAKE NOTICE that Robert Wagstaff (the “**Foreign Representative**”), in his capacity as duly appointed foreign representative by Mr. Fernando Alonso-de-Florida Rivero, the court-appointed liquidator (*Liquidador Judicial*) (the “**Mexican Liquidator**”) of the Special Expedited Commercial proceeding (*Via Sumaria Especial Mercantil*) for the dissolution and liquidation (the “**Mexican Liquidation Proceeding**”) of Crédito Real, S.A.B. de C.V., SOFOM, E.N.R., (“**Crédito Real**” or the “**Chapter 15 Debtor**” and, together with its affiliates, the “**Company**”) pending in the 52nd Civil State Court of Mexico City pursuant to, among others, Articles 229, 232, 233, and 236 of the *Ley General de Sociedades Mercantiles*, by and through his undersigned counsel, has today filed the attached *Foreign Representative’s Motion for Entry of an Order (I) Authorizing and Approving Entry Into Stalking Horse Agreement and Related Bid Protections in Connection With the Sale of Chapter 15 Debtor’s Equity Interests in Crédito Real USA Finance, LLC, (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief* (the “**Motion**”) with the United States Bankruptcy Court for the District of

¹ The last four identifying digits of the tax number and the jurisdiction in which the Chapter 15 Debtor pays taxes is Mexico – 6815. The Chapter 15 Debtor’s corporate headquarters is located at Avenida Insurgentes Sur No. 730, 20th Floor, Colonia del Valle Norte, Alcaldía Benito Juárez, 03103, Mexico City, Mexico.

Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that contemporaneously with the filing of the Motion, the Foreign Representative also filed a motion to shorten the notice and objection periods with respect to the Motion (the “**Motion to Shorten**”).

PLEASE TAKE FURTHER NOTICE that if the Court grants the relief requested in the Motion to Shorten: (i) a hearing to consider the Motion will be held on **January 25, 2023 at 10:00 a.m. (Eastern Time)** before The Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801, and (ii) any responses or objections to the Motion may be made by **January 24, 2023 at 12:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if the Court approves or denies, in whole or in part, the relief requested in the Motion to Shorten, parties-in-interest will receive separate notice of the Court-approved objection deadline and hearing date for the Motion.

Dated: January 18, 2023

Respectfully submitted,

/s/ Amanda R. Steele

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